

From: [Doug Lansing](#)
To: Mullin.Michelle@epa.gov
Subject: FW: A couple of questions about Phase IIb
Date: Wednesday, March 18, 2020 8:39:59 AM

[EXTERNAL]

Hi Michelle;

I hope this email finds you settling in to your new teleworking process. (b) (6)

(b) (6)

I copied your questions, in bold below, with our responses following. Please let me know if there are any other clarifications needed, and thanks for the update on the Plan's status. After the legal department's final review, will the plan be on track for final signatures and release?

1. The previous approval noted that chromium, copper, nickel, zinc and lead were the metals identified from the copper slag analysis as those you would evaluate in ghost wipe samples. Is this still your plan, or do you plan to re-test the slag first?

The product remains consistent with earlier testing. The protocol remains the same. The most recent manufacturer's Safety Data Sheet (SDS), dated April 18, 2018, indicates that the chemical composition of trace elements contained in the blast media remain at the levels and ratios found in previous testing. Therefore, our current analysis of trace metals utilized to identify the blasting media's "signature" remains valid. Should any PCB wipe samples return a test result higher than regulated limits, we will look to the metal testing to see if there is a correlation to the blasting media metal concentrations and ratios. The current SDS can be viewed at: <https://kleenblast.com/wp-content/uploads/KLEEN-BLAST-SDS.pdf>.

2. The Phase I approval required these metals to be evaluated in the aqueous and sediment samples, but I do not think I saw that in Supplement 5, Exhibit 5. I was planning to write this in as a condition in the approval but wanted to check with you first if there is a reason you did not include it.

Metals are not included as an analytical requirement for each and every aqueous and sediment sample. As with the wipe sampling, samples will be gathered and held by the laboratory, but will only be analyzed for metals if the PCB levels trigger the next step in our evaluative protocol/investigative path.

The metals analysis by itself, without a PCB exceedance does not provide valuable data for our abatement project. Our proximity to the freeway, for example, produces considerable background metals like zinc and copper and other metals found in car brakes and other parts that wear. For the same investigative reasons that we will be collecting Ghost-Wipes during wipe sampling, the first step in the aqueous and sediment catch basin sampling protocol will only include the retention of sampled materials, but not require the cost to run the laboratory analysis (which again does not yield useful data for this project) unless and until PCB results indicate a move to the next investigative step, in which case the samples will be analyzed for metals.

3. Are you also characterizing your waste for these metals? I think it may be necessary to determine if it is designated under WA Dangerous waste regs.

The waste disposal contractor, currently Clean Harbors (formerly Emerald Recycling) will perform any and all applicable characterization analysis necessary to profile the waste and to meet all Federal

and State regulations. Whichever are more stringent will drive the required characterization and ultimate disposal requirements. We also note that the blasting media manufacturer's analysis, as published in the current product SDS (Sections 3 and 15) states that no hazardous substances are present at regulated limits. Analytical testing performed by NVL Laboratories confirms the ratios of trace elements listed on the SDS. Nonetheless, if a TCLP, bioassay, or other testing is appropriate for waste characterization prior to disposal, it will be done.

4. Regarding the elevator shafts- is it possible to put them under positive pressure during blasting? Or disable the elevator only during blasting hours when the exterior of the shaft is being abated?

The campus has a total of five operating elevator conveyances. Our two passenger elevators, located in Buildings 21/22 and 25, are equipped with pressurized elevator shafts for fire department use during emergencies. After conferring with our elevator maintenance/repair company, they do not recommend subjecting the conveyances to several hours of pressurization for multiple days. The system is not designed for this.

Building 25's elevator has limited exposed to exterior wall surfaces subject to abatement. This occurs in one location, only at the 8th floor Elevator Control Room. This room is large enough to accommodate all the interior containment protections utilized in all other habitable spaces. Furthermore, both passenger cars in these elevators (Building 21/22 and 25) are fully enclosed, making the introduction of foreign materials very unlikely. These conveyances will be included as a part of our daily visual inspections performed during the course of all blasting operations. The three freight elevators, located in Buildings 5A, 8, and 9, have unenclosed (open) cabs and are not equipped with pressurized shafts. For Set-Ups that include blasting any portion of these elevator shafts, the conveyance will be disabled during active blasting hours. Upon completion of daily blasting, clearance of these elevators for tenant use will follow the same inspection protocol as all other affected spaces.

Doug Lansing

Construction and Facilities Manager

Rainier Commons, LLC

From: Doug Lansing

Sent: Friday, March 13, 2020 7:34 AM

To: Mullin, Michelle

Subject: RE: A couple of questions about Phase IIb

(b) (6)

[Redacted]

Doug Lansing

Construction and Facilities Manager

Rainier Commons, LLC

From: Mullin, Michelle <Mullin.Michelle@epa.gov>

Sent: Thursday, March 12, 2020 12:46 PM

To: Doug Lansing (b) (6)

Subject: RE: A couple of questions about Phase IIb

(b) (6)

Michelle Mullin | PCB Coordinator and Team Leader | pronouns: she, her
U.S. Environmental Protection Agency | **Region 10**
Land, Chemicals and Redevelopment Division
1200 6th Avenue | Ste 155
Seattle, WA 98101
p: 206.553.1616 | mullin.michelle@epa.gov

From: Doug Lansing (b) (6)

Sent: Thursday, March 12, 2020 11:59 AM

To: Mullin, Michelle <Mullin.Michelle@epa.gov>

Subject: RE: A couple of questions about Phase IIb

Good Morning Michelle:

I wanted to acknowledge receipt of this email. I'll be working on a response and will get back to you shortly.

Is your office practicing tele-working? (b) (6)

Best wishes in keeping you and your family healthy;

Doug Lansing

Construction and Facilities Manager

Rainier Commons, LLC

From: Mullin, Michelle <Mullin.Michelle@epa.gov>

Sent: Tuesday, March 10, 2020 4:09 PM

To: Doug Lansing (b) (6)

Subject: A couple of questions about Phase IIb

Hi Doug-

The approval is in legal review now. A couple of questions came up.

1. The previous approval noted that chromium, copper, nickel, zinc and lead were the metals identified from the copper slag analysis as those you would evaluate in ghost wipe samples. Is this still your plan, or do you plan to re-test the slag first?
2. The Phase I approval required these metals to be evaluated in the aqueous and sediment samples, but I do not think I saw that in Supplement 5, Exhibit 5. I was planning to write this in as a condition in the approval but wanted to check with you first if there is a reason you did not include it.
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4. Regarding the elevator shafts- is it possible to put them under positive pressure during blasting? Or disable the elevator only during blasting hours when the exterior of the shaft is being abated?

RCLLC 0010286

Thank you,

Michelle Mullin | PCB Coordinator and Team Leader | pronouns: she, her
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